

RE: EDGAR F CONTRERAS
DELIA B CIRUELAS

) Case No. 19 B 25114
)
Debtors) Chapter 13
)
) Judge: JACK B SCHMETTERER

NOTICE OF MOTION

EDGAR F CONTRERAS
DELIA B CIRUELAS
4442 W GUNNISON I
CHICAGO, IL 60630

ROBERT J ADAMS & ASSOC
via Clerk's ECF noticing procedures

Please take notice that on November 20, 2019 at 11:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on October 24, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On September 05, 2019 the Debtors filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtors has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend Plan as follows: Part 3.1 list amount of current installment and add after address "principal residence", Part 3.3 provide for condo association in Part 3.2 instead of 3.3 and Part 8 to provide that 5% interest be paid to all unsecured creditors including priority and special class claims.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,
/s/ Tom Vaughn

TOM VAUGHN
CHAPTER 13 TRUSTEE
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(312) 294-5900